

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

CHARLOTTE CHARLES, *et al.*,

Plaintiffs,

v.

ANNE SACOOLAS and JONATHAN  
SACOOLAS,

Defendants.

Civil Action No. 20-1052-TSE

**UNITED STATES' CONSENT MOTION FOR LEAVE TO FILE REPLY IN SUPPORT  
OF MOTION FOR PROTECTIVE ORDER**

Pursuant to 28 U.S.C. § 517, the United States, through undersigned counsel, hereby respectfully moves for leave to file a reply in support of its proposed motion for protective order. The grounds for this motion are set forth below. Undersigned counsel has conferred with counsel for the parties regarding the relief sought in this motion; the parties consent to this motion for leave to file but Plaintiffs note their continued opposition to the United States' underlying motion for protective order.

The United States has moved for leave to file a motion for protective order in this litigation. ECF No. 62 (motion for leave); ECF No. 62-2, 62-3 (proposed motion for protective order and memorandum in support). Although Plaintiffs consent to that motion for leave to file, ECF No. 64, they oppose the underlying motion for protective order and have filed a provisional opposition brief to that motion, ECF No. 67-1. Should the Court choose to take up the United States' proposed motion for protective order at the hearing currently scheduled for August 13, 2021, the United States seeks leave to file the attached reply to briefly respond to points raised in the Plaintiffs' provisional opposition.

As discussed in the United States' prior motion for leave to file, ECF No. 62, this motion should be granted pursuant to 28 U.S.C. § 517, which provides that an officer of the Department of Justice "may be sent by the Attorney General to any State or district in the United States to attend to the interests of the United States in a suit pending in a court of the United States . . . or to attend to any other interest of the United States." In light of this statutory authority, the United States may file the attached reply brief.

For the foregoing reasons, this Court should grant the United States leave to file a reply in support of its proposed motion for protective order. A proposed order has been attached for the convenience of this Court.

Dated: August 11, 2021

Respectfully submitted,

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